

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESAL PRICE
LITIGATION

MDL NO. 1456

CIVIL ACTION: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Judge Patti B. Saris

MOTION FOR WITHDRAWAL OF APPEARANCE

Pursuant to Local Rule of Civil Procedure 83.5.2(c), Defendant Novartis Pharmaceuticals Corporation ("Novartis") requests that the Court permit Jeremiah L. Frei-Pearson of Kaye Scholer to withdraw as counsel for Novartis in this Action and all related actions. In support of this motion, Novartis states that the existing appearances of Karen F. Green and Brett R. Budzinski of Wilmer Cutler Pickering Hale and Dorr LLP as well the other attorneys who individually have entered *pro hac vice* appearances remain in effect and are not affected by this withdrawal.

Respectfully submitted,

/s/ Brett R. Budzinski

Karen F. Green (BBO #209050)

Brett R. Budzinski (BBO #655238)

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Dated: September 25, 2006

CERTIFICATE OF SERVICE

I, Brett Budzinski, certify that, on this September 25, 2006, a copy of the foregoing document has been served on counsel of record by electronic means pursuant to the Court's Case Management Order dated July 23, 2002.

/s/ Brett Budzinski

Brett Budzinski